

#### **EXHIBIT A**

Bank of America Plaza 901 Main Street, Suite 6515 Dallas, Texas 75202 Tax ID #: 76-0762764

Todd Meagher 2101 Legacy Court Keller, TX 76248

February 19, 2020

Re: Chapter 11 Reorganization

Payable only upon order of the Court

Matter #: 10326 Invoice #: 27884

#### **PROFESSIONAL SERVICES:**

		<b>Hours</b>	Amount
1/16/2020 RCR B80	Review client's Suggestion of Bankruptcy and confer with M. Castillo and S. Curtis regarding same.	0.20	50.00
RCR B10	Email client advising	0.10	25.00
RCR B10	Brief Atty - Declaration regarding small business debtor documents with the Court.	0.10	25.00
RCR B10	Confer with C. Harbin on case strategy.	0.30	75.00
MC B130	Discussion with S. Curtis regarding	0.10	49.50
MC B10	Brief atty initial filing obligations.	0.20	99.00

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 2 of 9

Todd Mea	gher		Page	2
			Hours	Amount
1/17/2020	MC B10	Brief attention to filings and direction to R. Rowe on service of 341 and finalizing and filing employment application on Monday.	0.20	99.00
	RCR B10	Email correspondence with US Trustee regarding Initial Debtor Interview; confer with client on rescheduling same.	0.10	25.00
	RCR B30	Email client to request information for completion of schedules and statements.	0.10	25.00
	MC B130	C arding	0.40	198.00
	MC B40	Respond to first-day inquiry from U.S. Trustee	0.10	49.50
1/20/2020	RCR B10	Review client bankruptcy documents and call client to discuss case strategy.	0.40	100.00
	CLH B130	Discussion of	0.50	175.00
	CLH B90	Task clerk with research regarding	0.50	175.00
	MC B40	Direction to R. Rowe regarding 341 notice and timing of upcoming filings.	0.10	49.50
	MC B130	Brief discussion and emails with C. Harbin regarding	0.20	99.00
1/21/2020	MC B10	Follow up with/ R Rowe regarding: case obligations	0.20	99.00
	MC B110	Final review and edit to app to employ Curtis   Castillo PC, supporting declaration, proposed order, and Notice of hearing (.7); review and comment on app to employ special litigation counsel (.3).	1.00	495.00
	CLH B110	Draft Application to employ special counsel. (1.4); Draft Proposed Order (.5); Review and revise declaration in support (.4)	2.30	805.00

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 3 of 9

Todd Meagher		Page	3	
			Hours	Amount
1/21/2020	RCR B90	Confer with law clerks and C. Harbin regarding research issues for	0.20	50.00
		Confer with C. Harbin on applications to employ counsel (.1); provide instruction to law clerks on creditors' meeting and employment application mailings (.1).	0.20	50.00
	RCR B30	Review client's bankruptcy forms and email client with comments and requests for supplemental information (.2); begin drafting schedules and statements using client information (.3).	0.50	125.00
	LC B90	Research and draft Memorandum and proper procedure of (1.5 hrs No Charge)	2.00	250.00
	RCR B30	Confer with client on	0.20	50.00
	RCR B10	Telephone call and email to court deputy regarding small business debtor documents.	0.10	25.00
	RCR B10	Finalize declarations in lieu of SBD Documents.	0.10	25.00
1/22/2020		Brief attention to retention of special litigation counsel and direction to R. Rowe on timing given expected additional creditors from Debtor.	0.20	99.00
	RCR B10	Follow up email to US Trustee regarding rescheduling Initial Debtor Interview.	0.10	25.00
	CLH B110	Review and finalize Motion to Employ Special Litigation Counsel and Declaration in Support and transmit to client for review.	0.60	210.00
	MC B40	Return call to U.S. Trustee regarding case overview.	0.10	49.50
		Fiinalize Applications to Employ Curtis Castillo and Gary Pate (.4); ensure service of creditors' meeting notice and employment applications (.4); draft certificate of service for meeting notice and employment applications (.2).	1.00	250.00

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 4 of 9

Todd Meagher		Page	4
		Hours	Amount
1/23/2020 MC B40	Review case summary information from R. Rowe (.2); return call to L. Young (left detailed vmail) (.1).	0.30	148.50
RCF B10	Provide instruction to law clerks on drafting certificates of service and approve same.	0.30	75.00
RCF B40	Prepare case primer to assist on US Trustee and credit queries.	0.90	225.00
RCF B30	Review new client materials for and incorporate into schedules and statements (1.0); Skype call with client to discuss same (.5).	1.50	375.00
1/24/2020 RCF B30	Emails with client regarding Frost Bank loan payoff; confer with M. Castillo regarding same.	0.20	50.00
RCF B10	Research	0.30	75.00
MC B60	Discuss Debtor's with R. Rowe.	0.10	49.50
RCF B30	Request CLEAR Report on client for additional information to complete schedules and statements.	0.20	50.00
1/27/2020 RCF B30	Continue drafting schedules and statements using client documents, credit and CLEAR reports.	0.40	100.00
MC B30	Direction to R. Rowe regarding schedules extension.	0.10	49.50
RCF B30	Telephone call to US Trustee to confer on extension of time to file schedules and statements.	0.10	25.00
LC B90	R (1.0 hrs No Charge)	1.50	187.50
1/28/2020 MC B10	Follow-up with R. Rowe regarding impending initial case deadlines (.3); brief review and comment on motion for more time on schedules etc. (.2)	0.50	247.50

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 5 of 9

Todd Meagher		Page	5
		Hours	Amount
1/28/2020 RCF B30	Review and revise Motion and Order for Extension of Time to File Schedules and Statement of Financial Affairs (.7); request court deputy authorization to upload order for entry (.1).	0.80	200.00
1/29/2020 MC B30	Check with R. Rowe regarding status of order on schedule extension.	0.10	49.50
RCF B30	1 27 1	0.10	25.00
1/30/2020 RCF B10	Review client email; respond via email with explanation of Chapter 11 dismissal rules and confirm new schedules/statements deadline.	0.30	75.00
MC B13	Attention to email correspondence from litigation counsel regarding .	0.20	99.00
1/31/2020 MC B10	Provide case deadlines update to T. Meagher and team.	0.10	49.50
2/3/2020 MC B10	Brief atty case calendar and upcoming Initial Debtor Interview and early case events	0.10	49.50
LC B90	Draft Memorandum , (1.5 hrs	1.50	187.50
2/4/2020 RCF B10	Compile initial debtor interview materials and draft instructional primer for client to review before tomorrow's meeting (.5); confirm telephonic Initial Debtor Interview and circulate call-in instructions (.1); review and reply to client email regarding Initial Debtor Interview format and his obligations as Debtor in Possession (.2)	0.80	200.00
RCF B10		0.40	100.00
RCF B40		1.60	400.00

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 6 of 9

Todd Meagher		Page	6
		Hours	Amount
2/5/2020 RC B10	Prepare for and conduct conference call with client and US Trustee for Initial Debtor Interview (1.0); email client with followup information (.2); complete pension information form and submit to Trustee (.2).	1.40	350.00
2/6/2020 MC B1	Brief direction to R. Rowe regarding first draw-down motion.	0.30	148.50
2/10/2020 RC B1	Revise Motion and Order for Draw Down on Retainer.	0.40	100.00
RC B30		0.20	50.00
2/11/2020 RC B30	R Further revisions to Schedules and Statements.	2.20	550.00
2/12/2020 RC B1		0.20	50.00
MC B80		0.30	148.50
LC B3	Assist R. Rowe complete Bankruptcy Schedules by searching PTO	0.20	25.00
MC B3		0.80	396.00
RC B30		2.80	700.00
2/13/2020 RC B10		0.20	50.00
2/16/2020 MC B1	Weekend email from and to T. Meagher regarding overall structure of plan.	0.10	49.50

# Case 20-40208-mxm11 Doc 32-1 Filed 02/27/20 Entered 02/27/20 15:15:31 Desc Exhibit A Page 7 of 9

Todd Meagher		Page	7
		Hours	Amount
2/16/2020 MC B130	Weekend email from and to T. Meagher regarding	0.10	49.50
2/17/2020 MC B110	Direction to R. Rowe regarding retention orders.	0.10	49.50
LC B105	Draft certificate of no objection to applications to employ Curtis Castillo and special counsel.	0.50	62.50
2/18/2020 MC B10	Brief attention to email correspondence with T. Meagher regarding next steps (.1); follow-up with R. Rowe and staff regarding Certificate of Service of 341 notice (.1) and motion to draw down prepet retainer (.1).	0.30	148.50
RCR B10	Verify certificates of service were sent to creditors list and update M. Castillo regarding same.	0.10	25.00
MC B90	B Harbin regarding briefly review emails from 1. Meagher to prepare for tomorrow's strategy call.	0.40	198.00
2/19/2020 RCR B10	Revise and finalize certificates of no objection to retention applications.	0.40	100.00
RCR B90	Review Motion to Lift Stay (.3); review client's draft pleading prior to conference call (.2); attend 2pm conference call with client and special counsel G. Pate and M. Castillo (1.2).	1.70	425.00
MC B90	Review Motion for relief from automatic stay and draft response from Debtor and consider issues for response (1.0); prepare and send agenda for 2pm strategy call to R. Rowe and lead counsel (.2); participate in stratgey call with Debtor, C. Harbin (for trademark background) and R. Rowe (for pleading implementation) (.9); consider next steps and post-conference with C. Harbin and R. Rowe regarding next steps (.6).	2.70	1,336.50
CLH B90	Review draft of lift-stay respond authored by client and discuss internally with M. Castillo and Robert Rowe (.5); participate in strategy conference call with client regarding Motion for relief from automatic stay (1.0).	1.50	525.00

Todd Meagher	Page	8

	Hours Amount
For professional services rendered <b>EXPENSES:</b>	41.70 \$12,555.50
Research expense	16.00
Research Expense/PACER	42.30
Postage	9.90
Postage	11.20
Duplication Charges	67.75
Total expenses	\$147.15
Total new charges	\$12,702.65
Balance Due	\$12,702.65

#### **Attorney Summary**

Name	Hours	Rate	Amount
Christopher Harbin - B110 - Professional Retention	2.90	350.00	\$1,015.00
Christopher Harbin - B130 - Asset Sales	0.50	350.00	\$175.00
Christopher Harbin - B90 - Avoidance (Adversary) Actions	2.00	350.00	\$700.00
Law Clerk B105 - Plan and Disclosure Statement Drafting	0.50	125.00	\$62.50
Law Clerk B30 - Schedules/SOFA/Lists	0.20	125.00	\$25.00
Law Clerk B90 - Avoidance (Adversary) Actions	5.00	125.00	\$625.00
Mark Castillo B10 - Case Administration	1.60	495.00	\$792.00
Mark Castillo B100 - Plan & Disclosure Statement Discussions	0.10	495.00	\$49.50
Mark Castillo B110 - Professional Retention	1.30	495.00	\$643.50
Mark Castillo B115 - Professional Payment	0.30	495.00	\$148.50
Mark Castillo B130 - Asset Sales	1.00	495.00	\$495.00
Mark Castillo B30 - Schedules/SOFA/Lists	1.00	495.00	\$495.00
Mark Castillo B40 - Creditor Inquiries/Meetings	0.60	495.00	\$297.00
Mark Castillo B60 - Leases, Executory Contracts, & Utilities	0.10	495.00	\$49.50
Mark Castillo B80 - Litigation (Contested) Matters	0.30	495.00	\$148.50
Mark Castillo B90 - Avoidance (Adversary) Actions	3.10	495.00	\$1,534.50
Robert Rowe B10 - Case Administration	5.50	250.00	\$1,375.00
Robert Rowe B110 - Professional Retention	1.40	250.00	\$350.00
Robert Rowe B115 - Professional Payment	0.40	250.00	\$100.00
Robert Rowe B30 - Schedules, SOFA, Lists	9.30	250.00	\$2,325.00
Robert Rowe B40 - Creditor Inquiries/Meetings	2.50	250.00	\$625.00
Robert Rowe B80 - Litigation (Contested) Matters	0.20	250.00	\$50.00
Robert Rowe B90 - Adversary Avoidance or recovery litigation	1.90	250.00	\$475.00

**Todd Meagher** Page 9

Payment is **DUE UPON COURT APPROVAL.**In addition to cash, checks and money orders, we accept payment by American Express, Discover, Visa and Mastercard. Please call 214.752.2222 to make a payment by credit card.